



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

WA3019
10B
9/26/13

OFFICE OF
AIR, WASTE AND
TOXICS

SEP 26 2013

Ms. RueAnn Thomas
Environmental Programs Director
J.H. Baxter & Co.
85 N. Baxter Road
P.O. Box 10797
Eugene, OR 97440-2797

Re: Conditional Approval of *Revised Source Area Investigation and Chemical Oxidation Pilot Test Work Plan* (Work Plan)
Former J.H. Baxter & Co. ("Baxter"), Arlington Facility ("Facility")
§ 7003 Administrative Order on Consent ("Order")
Docket No.: RCRA-10-2001-0086
EPA ID No.: WAD 05382 3019

Dear Ms. Thomas:

The U.S. Environmental Protection Agency, Region 10 ("EPA") has reviewed the above referenced Work Plan, dated August 20, 2013. EPA hereby approves the Work Plan conditioned on the following requirement:

Baxter must sample all monitoring wells for all metals which have a national Primary Drinking Water Standard within 30 days of completion of the pilot test, and submit a report to EPA showing the results within 60 days of sampling.

While not required, EPA recommends that Baxter analyze groundwater for metals prior to the pilot study to provide a baseline.

Please contact me at (206) 553-6702 or at palumbo.jan@epa.gov, or have your legal counsel contact Jennifer MacDonald at (206) 553-8311, if you have any questions.

Sincerely,

Jan Palumbo
Project Coordinator

FILE COPY

cc: James C. Hanken
Wolfstone, Panchot & Bloch

Georgia Baxter
J.H. Baxter, San Mateo

Douglas Fox
Stella-Jones Corp.

Dean Yaxuda
Washington State Department of Ecology

J. Stephen Barnett
Premier Environmental, Portland

Region 10 Routing and Concurrence

Author:	Jan Palumbo	Date:	9/24/13
Addressee:	RueAnn Thomas		
Subject:	Conditional Approval of Chemical Oxidation Pilot Test Work Plan		
File Location/Name:			

PROGRAM ADMIN REVIEW:

Name:	WEISS	PALUMBO	ORC	OEA	POLICY FILE YES/NO	RCRAINFO YES/NO
Initials/Date:		9/24/13		9/24/13		

PROGRAM OFFICE CONCURRENCE:

Name:	ARRIGONI		CASTRILLI	FISHER	HEDEEN	BROWN	MEYER
Initials/Date:		1	9/24/13				

RA OFFICE CONCURRENCE/SIGNATURE:

Name:						
Initials/Date:						

cc(s) (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

James C Hanken Wolfstone, Panchot & Bloch 1111 Third Ave., Suite 1800 Seattle WA 98101	Douglas Fox, Stella-Jones Corp.	J Stephen Barnett AMEC Environment & Infrastructure 7376 SW Durham Road Portland, OR 97224
Gary Dupuy AMEC Environment & Infrastructure One Union Square 600 University Street, Suite 600 Seattle, WA 98101	Georgia Baxter J.H. Baxter & Co. P.O. Box 5902 San Mateo, CA 94402	Dean Yashuda Washington Department of Ecology 3190 160th Ave SE Bellevue, WA 98008-5452

bcc(s) (include name, title, organization, mailing address, and email if PDF is required—attach a list if necessary)

	J. Palumbo (AWT-121)	
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Mailing Deadline:	9/27/13	Certified Mail:	original only
FAX to:		FAX #:	
ADDITIONAL INFO/INSTRUCTIONS:			
Filing Instructions:	WAD 05382 3019 FF 10C		
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RueAnn Thomas Environmental Programs Director J.H. Baxter & Co. 85 N. Baxter Rd. P.O. Box 10797 Eugene, OR 97440		Mail <input type="checkbox"/> Express Mail ad <input type="checkbox"/> Return Receipt for Merchandise Mail <input type="checkbox"/> C.O.D.	
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